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December 9, 2020

Via Electronic Mail and Filed by ECF

The Honorable Pamela K. Chen
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Traffic Sports USA et al., Docket No. 14-cr-609 (PKC)
Consent Request for Limited Stay of Restitution Payment

Dear Judge Chen:

We write on behalf of Traffic Sports USA, Inc., (“TUSA”) and Traffic Sports International, Inc., (“TSI”) (jointly “Traffic”), corporate defendants who were cooperators and pled guilty in connection with the investigation of corruption in international soccer conducted by the Department of Justice (“DOJ”). With the government’s consent, we write to request another stay, until May 20, 2021, of Traffic’s pending restitution obligations.

The government has reported in an appeal pending before the United States Court of Appeals for the Second Circuit that it has “reached an agreement in principle on a request for remission or restoration that would make each of the victims whole, extinguish existing restitution obligations, and moot further restitution requests.” *See United States v. Webb (Li, Jimenez)* (2d Cir.), Dkt. Nos. 19-581(L), 19-1348(CON), ECF No. 83. The government intends to submit a petition for remission or restoration to Attorney General’s designees at the DOJ’s Money Laundering and Asset Recovery Section on or before December 23, 2020. *Id.*

This request for a stay of Traffic’s pending restitution obligations will allow the government to submit a petition for remission or restoration and await the determination from the DOJ. The Court also granted prior stays of Traffic’s restitution payments while the government was in discussions with victims to reach an agreement on restitution. *See Orders* (May 13, 2020, July 21, 2020, and October 16, 2020). This Court has also granted stays of restitution in related cases, including *United States v. Eduardo Pletsch* (16-CR-454) and *United States v. José Margulies*, (15-CR-252).

This request for a stay relates to the Court’s previous order finding TUSA and TSI responsible, jointly and severally with other defendants, for restitution owed to CONMEBOL in

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the amount of \$333,587.25, which the Court ordered the entities to pay on a specific schedule. *See* Order (June 19, 2019). Traffic made the initial restitution payments due in November 2019 (\$30,000 total) and also completed the probationary sentence that the Court had previously imposed, which included payment of combined \$1,000,000 in fines.

Traffic now seeks an additional stay until May 20, 2021, to allow the DOJ to submit and process the application for remission or restoration. The government consents to this request and to the proposed timing of the stay.

Please let us know if any additional information would be helpful.

Respectfully submitted,

/s/ Margarita K. O'Donnell

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